



December 1, 2009

Sustainable Communities Planning Grant and Incentives Program
c/o The Department of Conservation, Office of Sustainability
801 K Street, MS 24-01
Sacramento, CA 95814
Sent via email: DOCSustainability@conservation.ca.gov

Esteemed Members of the Strategic Growth Council,

With the Sustainable Communities Planning Grant and Incentives Program guidelines before it, the Strategic Growth Council has the opportunity to hit a home run – to immediately take the reins to steer California's physical evolution for the 21st century. It can send a strong signal of its California's long-term vision and commitment to create sustainable, model communities. We applaud the efforts of the staff and Council in creating the October 2009 draft guidelines.

We, the undersigned organizations, have a vision. We are sure the Council shares it. Imagine giving tomorrow's young families or retirees *a real choice* – not present today – to live in a safe, affordable, peaceful, and complete neighborhood. A community where schools, parks, transportation choices including public transit, shopping, open space, senior/community center, and jobs are all within a close distance of quiet, energy-efficient homes. A neighborhood, with clean air and water, where people can walk to farmers' markets and buy affordable, fresh produce from nearby farmland.

The grant guidelines take an excellent first step towards achieving this vision by emphasizing the state's planning priorities, the California Global Warming Solutions Act of 2006, and the significant local and regional effort that went into past regional blueprints.

Mixed and integrated infill development when partnered with local and regional open space and natural resource protection efforts, and when done well, meets almost all of the goals of Prop. 84. Such development reduces commute times, vehicle miles traveled and greenhouse gas emissions, air pollution and its health impacts, and water and energy usage. It helps to relieve the pressure to develop in greenfield areas, and to protect essential habitat, farmland, and ranchland. When coupled with air quality and environmental justice mitigation assurances, it improves public health by encouraging walking and biking, promoting pedestrian safety, and reducing air pollution.

However, we feel that strengthening and refinement is necessary to ensure that these limited grant funds will result in *real* on-the-ground change, and not paper plans and studies.

Accordingly, the primary litmus test for these guidelines should be their likelihood of resulting in near-term physical change that improves the lives of Californians consistent with Prop 84.

To succeed, the guidelines should target critical points in the planning process that typically logjam the type of development and protection of open spaces and farmland that Prop. 84 envisioned. With a few alterations, the guidelines can lead *directly* to more of this development. In order to achieve this vision, we suggest that the Council simplify the guidelines based on adoption of the following guiding principles:

- 1. Prioritize plans that result in real on-the-ground change in local communities;**
 - Rather than General Plans, focus on specific plans, neighborhood plans, master plans, ordinances, and zoning changes for infill areas (these other plans would require a General Plan update as part of their development and adoption)
 - Consider only awarding funds for General Plan updates that also include updating the zoning
 - Release the final grant payment when the adopted plan is as promised in the application in terms of implementation certainty – i.e., provides for development as of right (or as close as possible) – and did not get significantly weakened during the plan approval process.

For example, one of the biggest impediments to good infill development is advance area/neighborhood planning. Local government is not to blame; they are cash-strapped. State funding for local governments to adopt such specific, area or community plans will ensure our prime infill areas do not go under-utilized. The plans must increase density, housing affordability, and must include detailed and simple implementing procedures that will allow projects to be consistent with the plans to be built as-of-right. We cannot risk wasting money on plans that require many subsequent regulatory and permitting hurdles, which could greatly reduce the chance of on-the-ground development.

Successful achievement of the State's strategic planning goals requires effective implementation by local governments. Accordingly, a majority of these funds should go to local government.

2. **Leverage other regional planning funding.** Regional and local governments will be putting a tremendous amount of time and energy into creating their SB 375 plans. The SGC funds should leverage and complement these processes. With SGC funds, support the expansion of regional planning (including Blueprints, Sustainable Communities Strategies and Natural Community Conservation Plans) to ensure that these plans help to achieve *all* Proposition 84 and SB 732 goals:
 - natural resources protection and conservation (including regional advance mitigation planning)
 - agriculture land and ranchland protection
 - more efficient use of resources (e.g. water and energy efficiency)
 - public health improvements (e.g. disease and obesity prevention)
 - increased availability of affordable housing
 - water quality improvements
 - quantification of co-benefits when evaluating SCSs

For example, many transportation projects need to mitigate their impacts on habitat, natural resources, and/or farmland. The SCS process could be used to not only gather and consider natural resource and agricultural values of land but also establish a regional advance mitigation program that efficiently directs funds to willing sellers in the most essential places *before* the infrastructure is completed. This would expedite the delivery of important transportation projects while ensuring that the natural resource mitigation funds have maximum impact and ultimately create high-functioning ecosystems and agricultural areas.

3. **Promote local and regional collaboration.** This will use the funds in the most cost-effective manner and maximize leverage.
 - Seek regional input when determining local government awards. This input might include:
 - Regional prioritization of applications received
 - Include regional representative(s) on application review committee(s)
 - Award funds to regions for re-grants through existing and successful local grant programs that meet certain criteria

Regional coordination of growth is vital, particularly in areas where the public has already spent (or is planning to spend) millions for infrastructure for high-capacity rail and bus-rapid transit. For the investment to be successful, land use plans around the station need to allow sufficient and affordable housing and jobs. In turn, cities rely on the region to plan transportation investments that allow for safe, efficient travel.

As usual, California is out ahead of the rest of the country in its environmental policies – this time in a new arena – sustainable communities. With the Federal Partnership for Livable Communities effort just getting underway, the stakes are even higher for California to succeed. Adopting these guiding principles will ensure California’s success with this program, setting one more example for others to follow.

We appreciate the opportunity to be involved. This effort will be maximized for all of us if it is combined with – in terms of priorities – the two grant programs for urban greening planning and projects.

We will follow this letter with specific suggested revisions in a redline format.

Sincerely,

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